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Prepped by Ollie Stewart

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**POWERINE Oil Company**

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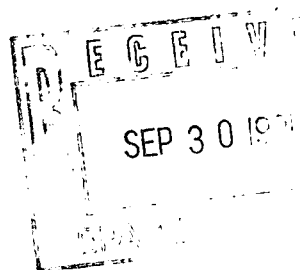
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September 24, 1991

Environmental Protection Agency
Public Docket A-91-46
Air Docket (LE-131)
401 M Street, S.W., Room M-1500
Washington D.C. 20460



Gentlemen:

Powerine Oil Company is an independent refining company that owns and operates a 49,000 bpd petroleum refinery in Santa Fe Springs, California. Powerine produces approximately 20,000 bpd of gasoline, and Powerine supports Ethyl's HiTEC 3000 waiver application to the Environmental Protection Agency. We support Ethyl's position that the HiTEC 3000 will probably maintain or reduce NO_x emissions in reformulated gasoline. Furthermore, the HiTEC 3000 will help Powerine meet the octane requirements of reformulated gasoline when benzene is removed from the gasoline blending pool.

Powerine, like other small refiners, is faced with major investments in order to come into compliance with the Clean Air Act amendment on reformulated gasoline. Furthermore, the state of California is also implementing reformulated gasoline standards that will require additional investment on the part of California refiners. Powerine's support of the HiTEC 3000 waiver application is important to Powerine's ability to remain in business in the 1990s when major investments in the petroleum refining industry will have to be made.

Very truly yours,

A. L. Gualtieri
President

ALG:ls

cc: Ms. Mary T. Smith
Director-Field Operations
and Support Division (EN-397F)